

**United States Environmental Protection Agency
Region III
POLLUTION REPORT**

Date: Tuesday, November 3, 2009

From: Mike Towle

Subject: Stoney Creek Technologies
3300 4th Street, Trainer, PA
Latitude: 39.830000
Longitude: -75.3975000

POLREP No.:	18	Site #:	
Reporting Period:		D.O. #:	
Start Date:	4/19/2007	Response Authority:	CERCLA
Mob Date:	4/19/2007	Response Type:	Emergency
Demob Date:		NPL Status:	
Completion Date:		Incident Category:	Removal Action
CERCLIS ID #:		Contract #	
RCRIS ID #:			

Site Description

See previous POLREPs for Site description information.

Stoney Creek Technologies (SCT) is presently no longer able to assure that safety systems are operating at the Site. Neither SCT nor other Respondents are conducting response actions; therefore, EPA is using its own contractor resources to conduct actions at the Site.

Currently, no production or manufacturing activity is occurring at the Site and employees are not present. EPA has completed the consolidation of the solvents, solvent-containing mixtures, and acids remaining at the Site. All tanks are prepared for off-site disposal and disposal is ongoing. EPA actions at the Site have also added to the tracked chemical inventory through consolidation of material not previously tracked (e.g., tank bottoms) or otherwise identified. An unknown amount of additional material remains within the pipelines, process vessels, filters, and other equipment found throughout the Site.

Current Activities

Respondents to the EPA Orders still are not removing the remaining chemical inventory at the Site pursuant to the assigned Order requirements. EPA is now conducting removal actions.

The OSC and START contractor are examining the tank inventory at the Site and determining if and when the tanks no longer pose a threat (e.g., cleaned by EPA such that liquids and/or vapors are no longer present or at elevated concentrations or that contents are unlikely to quickly release).

EPA contractors (which include former SCT employees) are supporting the removal action. Removal activities currently involve the removal and consolidation of tank liquids and the drumming of tank sludges in preparation of disposal of acids and flammable solvents. On-Site tanks containing oils and alkylates are also being consolidated and prepared for disposal.

In September 2009, EPA re-initiated disposal operations focused on solvent and acid materials. Since September 29, 2009, a total of 134,092 gallons of waste (hazardous and non-hazardous classifications) has been disposed. All bulk consolidation tanks are ready for disposal and contain a combined (approximate) 306,000 gallons of materials. The materials consist of chemicals such as Oleum, spent sulfuric acid, sulfonic acid, methanol, mineral spirits, and/or mixtures containing these materials.

EPA contractors have also been conducting line-clearing operations of pipelines, pumps, and other equipment that are located throughout the Site. Pipelines have been cleared of free flowing materials by disassembling pipeline components, then draining by gravity flow, collecting the material into drums, and preparing the material for disposal. Materials drained from the lines include mineral spirits, acids, sulfonates, former products, and mixtures of these materials.

The OSC inspected the laboratory complex on the Site and found thousands of small containers (jars,

cans, buckets) of various hazardous substances (e.g., Oleum) and oils (e.g., alkylate). A preliminary evaluation of the chemicals, intended to reduce the risk of fire, identified numerous flammable materials (e.g., heptane, ether). The flammable materials were then segregated and returned to appropriate on-Site storage where possible. The OSC directed that thousands of containers of flammable or combustible chemical samples be consolidated into the on-Site tanks. The OSC also directed that oleum, sulfuric (non-fuming) and sulfonic acid sample containers also be consolidated. The sample container consolidations are now completed. The contents have been consolidated into Tank 515 (sulfonate or oil or alkylate) or drums (acids). Their containers have been crushed and prepared for disposal in cubic yard boxes. Hundreds of other containers of other chemicals (non-sample related), remain in the lab and are being prepared for disposal.

In addition to the small sample containers in the laboratory, 44 lecture cylinders were found. The lecture cylinders were labeled as containing anhydrous ammonia, dimethylamine, trimethylamine, carbon dioxide, and sulfur dioxide. EPA contractors evacuated the contents of the cylinders through Tygon tubing and into an open-top drum of water. The cylinders were evacuated in a sequential order, as to neutralize the water as the cylinders emptied. The emptied cylinders were triple rinsed in the drum of water and placed into a scrap container. The drum of water was prepared for disposal.

EPA modified Site operations such that the on-Site nitrogen vapor-suppression system (which supplies nitrogen to all tanks) is no longer needed. Instead, the OSC directed actions such that solvent-containing materials are consolidated into a limited number of tanks which can be dealt with on an individual basis; solvent-containing material is now being removed from the Site. The OSC will substantially reduce the potential fire threat at the conclusion of the disposal operations over the upcoming weeks.

Additional activities continue to include monitoring and operation of the waste water pre-treatment facility. Periodic discharges of oily material into the pre-treatment facility continue even though no chemical manufacturing operations are occurring. Rainfall events appear to dislodge oily material from within the drainage system, which is routed throughout the facility. The oily material is separated and skimmed. The accumulated water is discharged to the nearby Stoney Creek from Tank 200. Three sampling events have been conducted, which indicate that the discharge meets parameters listed in a potential NPDES permit which the PADEP previously calculated for the Site's discharge.

The OSC continues to work with the EPA Environmental Response Team (ERT) to evaluate the source of an observed oily material discharging from the sidewalk outside of the facility onto the public roadway and then into the storm system which discharges to Stoney Creek. The oily material discharged from cracks in the sidewalk. The oily material was also observed discharging from cracks in the concrete and asphalt pavement within the site as well in the SACI area of the plant. The OSC has requested ERT to recommend the design of a collection trench to be installed alongside the Site boundary in the area of the oily material discharge.

PADEP continues paying for electricity required to keep the plant safe. SCT has been unable to meet the conditions of the DEP Consent Order and, as such, it never became effective. The OSC is now implementing steps to disconnect all electricity from the Site and to re-establish power needs specifically for the waste water plant and a limited amount of security lighting.

SCT is no longer able to demonstrate its viability pursuant to the EPA Order. Part of the demonstration requires SCT to have plans with critical utilities and to have regained its operating permits with PADEP. SCT continues to work towards financing.

The OSC continues to maintain a routine presence at the facility and is directing response activities relating to the on-Site waste water pre-treatment plant. EPA will remove oil and other contaminants from the tanks and basins associated with the on-Site waste water pre-treatment plant to assure that a release or discharge from this facility will not impact the nearby Stoney Creek.

Planned Removal Actions

Complete disposal of acid and solvent-containing material and remove residuals from tanks after disposal of bulk contents.

Conduct disposal of 14 tank contents (totaling about 306,000 gallons), materials from line-clearing operations, and consolidated laboratory containers.

Continue to clear pipelines of material, consolidate and prepare materials for disposal.

Continue to monitor, treat, and discharge excess waters from the Site into Stoney Creek.

Complete remaining response actions relating to the laboratory; small containers of acids, solvents, and other chemicals used to operate the lab need to be packaged for disposal

Prevent oily material from migrating from the Site into Stoney Creek via discharges onto the adjacent public roadway.

Complete air monitoring of tanks to examine the current fire threat posed by the Site.

Key Issues

Inadequate funding is available to the OSC to complete response actions.

Disposition of Wastes

Waste Stream	Quantity	Manifest #	Disposal Facility
T-174	3,8000 gal.	various (D001, D002)	Clean Harbors, Baltimore, MD
T-176	35,621 gal.	various (D001)	Clean Harbors, Baltimore, MD
T-198	3,960 gal.	various (Non-Haz)	FCC Environmental, Wilmington, DE
T-201	10,742 gal.	various (D001)	Clean Harbors, Baltimore, MD
T-337	11,190 gal.	various (Non-Haz)	Env. Recycling Corp., Lancaster, PA
T-340	19,967 gal.	various (Non-Haz)	FCC Environmental, Wilmington, DE
T-401	5,000 gal.	various (D001, D002, D003)	Clean Harbors, El Dorado, AR
T-406	24,375 gal.	various (D001)	Heritage WTI, East Liverpool, OH
T-407	14,892 gal.	various (D001, D002)	Clean Harbors, Baltimore, MD
T-411	12,776 gal.	various (D001)	Clean Harbors, Baltimore, MD
T-420	10,004 gal.	various (D001)	Casie Protank, Vineland, NJ
T-421	9,010 gal.	various (D001)	Casie Protank, Vineland, NJ
T-422	7,661 gal.	various (D001)	Clean Harbors, Baltimore, MD
T-424	8,638 gal.	various (Non-Haz.)	FCC Environmental, Wilmington, DE
T-425	8,450 gal.	various (D001)	Clean Harbors, Baltimore, MD
T-431A	32,631 gal.	various (D001, D002, D003)	Clean Harbors, El Dorado, AR
T-437	23,470 gal.	various (D001, D002)	Clean Harbors, Baltimore, MD
T-495	3,701 gal.	various (D001)	Clean Harbors, Baltimore, MD
T-521	16,667 gal.	various (Non-Haz.)	Env. Recycling Corp., Lancaster, PA
T-525	69,561 gal.	various (Non-Haz.)	FCC Environmental, Wilmington, DE
T-526	46,592 gal.	various (Non-Haz.)	FCC Environmental, Wilmington, DE
T-527 (tank bottom)	7,775 gal.	various (D001)	Clean Harbors, Baltimore, MD
T-527 (tank top)	10,287 gal.	various (Non-Haz.)	FCC Environmental, Wilmington, DE
T-539 (Feb. 09)	19,354 gal.	various (Non-Haz.)	Env. Recycling Corp., Lancaster, PA
T-539 (Oct. 09)	22,625	various (D001)	Clean Harbors, Baltimore, MD

	gal.		
T-640	34,208 gal.	various (Non-Haz.)	FCC Environmental, Wilmington, DE
T-641	30,609 gal.	various (Non-Haz.)	FCC Environmental, Wilmington, DE
T-660	30,750 gal.	various (D001)	Clean Harbors, Baltimore, MD
T-661	21,264 gal.	various (Non-Haz.)	Env. Recycling Corp., Lancaster, PA
T-663	41,010 gal.	various (Non-Haz.)	FCC Environmental, Wilmington, DE
T-680	17,013 gal.	various (Non-Haz.)	FCC Environmental, Wilmington, DE
T-681	20,339 gal.	various (Non-Haz.)	FCC Environmental, Wilmington, DE

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